

UNITED STATES OF AMERICA
Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In The Matter Of:

Rules and Policies Concerning
Multiple Ownership Of Radio
Broadcast Stations In Local
Markets

MM Docket No. 01-317

Definition Of Radio Markets

MM Docket No. 00-244

**WRITTEN COMMENTS OF DON SCHELLHARDT
AND NICKOLAUS E. LEGGETT**

DON SCHELLHARDT is a Government Relations attorney, currently engaged in post-doctoral coursework at the University of Denver College of Law. NICKOLAUS E. LEGGETT is a technical writer, inventor, computer expert and Amateur Radio Operator, residing in Reston, Virginia.

The two of us have often filed tandem Comments with the FCC. In addition, we have been partners in drafting and filing the Petitions For Rulemaking which triggered FCC Dockets RM-9208 (establishing a Low Power Radio Service) and RM-10330 (shielding of civilian electronics equipment against a possible Electromagnetic Pulse attack).

We are both concerned citizens, who see dangers for representative democracy in the increasingly “consolidated” control over the free flow of ideas and information in radio & TV broadcasting, as well as in publishing and other parts of the mass media.

Naturally, we are both strongly opposed to removing the remaining restraints on the number of radio stations which can be owned by a single company in a single local market. Indeed, we believe the existing “media ownership caps” should be *lowered*.

We are writing these current Comments to incorporate by reference the Written Comments we filed in FCC Docket MM 92-264 on October 10, 2001. We incorporate as well our other filings in the Docket, which concerns “caps” on media *cross*-ownership.

The referenced Written Comments raise many points which are relevant to the FCC’s deliberations in Dockets 01-317 and 00-244. The Commission should be sure to consider the referenced documents as it ponders decisions in the present proceedings.

Respectfully submitted,

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Dated: _____

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